



AGENDA DATE: 9/26/01  
AGENDA ITEM: 4E

**STATE OF NEW JERSEY**  
**Board of Public Utilities**  
*Two Gateway Center*  
*Newark, NJ 07102*

TELECOMMUNICATIONS

IN THE MATTER OF THE CONSULTATIVE REPORT ) PROCEDURAL ORDER  
ON THE APPLICATION OF VERIZON NEW JERSEY INC.)  
FOR FCC AUTHORIZATION TO PROVIDE IN-REGION, ) DOCKET NO. TO01090541  
INTERLATA SERVICE IN NEW JERSEY )

IN THE MATTER OF THE BOARD'S INVESTIGATION )  
REGARDING THE STATUS OF LOCAL EXCHANGE ) DOCKET NO. TX98010010  
COMPETITION IN NEW JERSEY )

IN THE MATTER OF BELL ATLANTIC- )  
NEW JERSEY, INC.'S PETITION FOR BOARD )  
VERIFICATION OF COMPLIANCE WITH SECTION 271 ) DOCKET NO. TO97030166  
OF THE TELECOMMUNICATIONS ACT OF 1996 )

(SERVICE LIST ATTACHED)

BY THE BOARD:

On September 5, 2001, Verizon New Jersey Inc. (Verizon) filed information with the New Jersey Board of Public Utilities (Board) that Verizon asserted establishes compliance with the requirements of Section 271 of the Telecommunications Act of 1996 (the Act)<sup>1</sup>. According to Verizon, the information in the filing will allow the Board to review Verizon's compliance with the Act's 14-point competitive checklist set forth in Section 271(c)(2)(B) and verify its compliance with the Federal Communications Commission (FCC) when Verizon seeks approval from the FCC to provide long distance services in New Jersey. The Board notes, that on March 7, 1997, Verizon, then known as Bell Atlantic-New Jersey, Inc., had filed a petition with the Board, which also sought Board verification of compliance with Section 271 of the Act. See BPU Docket No. TO97030166. In its September 5, 2001 filing, Verizon requested that the Board close Docket No. TO97030166.

By letter dated September 6, 2001, WorldCom, Inc. (WorldCom) requested that the Board extend the third-party testing of Verizon's operations support systems (OSS) to include Verizon's recently installed electronic billing, which is now available as the bill of record for

<sup>1</sup> The Act, Pub. L. 104-104, 110 Stat. 56, is codified in scattered sections of 47 U.S.C. §§151 et seq. Section 271 of the Act is codified in 47 U.S.C. § 271.

wholesale billing by Verizon. WorldCom asserted that Verizon's electronic billing is a "major issue" in the Verizon-Pennsylvania Section 271 application to the FCC. By letter dated September 7, 2001, WorldCom, Inc. submitted recommendations to the Board regarding the processes and procedures for development of the Board's consultative report to the FCC. WorldCom argued that TELRIC-compliant unbundled network element (UNE) rates, real-world testing of Verizon's OSS, and a Board-adopted and operational "Performance Assurance Plan" (PAP) must all be in place before local exchange markets in New Jersey can be deemed open to competition. According to WorldCom, because they are not in place, the Board should take no action on Verizon's 271 filing until six months after the latter of the Board's decisions on UNE rates, OSS testing, or a Performance Assurance Plan. WorldCom asserted that this six-month period will provide time to determine whether competition has developed. At the end of the six month period, WorldCom recommended an "assessment of the public interest in New Jersey," activation of this docket, and an evaluation of the state of competition and Verizon's compliance with the 14-point checklist. Finally, WorldCom recommended that the Board employ a process and schedule consistent with those used by the Pennsylvania Public Utility Commission in its recent review of Verizon Pennsylvania's 271 filing in that state.

By letter dated September 10, 2001, XO Communications stated that it supports and concurs in the recommendations and proposals presented by WorldCom in its letter dated September 7, 2001 and requested that the Board establish processes and procedures for development of its recommendation in this proceeding and defer a decision for six months after all necessary Board decisions are issued.

By letter dated September 10, 2001, the Division of the Ratepayer Advocate (Advocate) submitted comments in support of the Worldcom September 7, 2001 request that the Board establish processes and procedures for development of its recommendation to the FCC in this matter. The Advocate argued that VNJ's filing is premature and "not ripe for consideration" because several key areas, which remain unresolved, preclude the Board from seriously entertaining Verizon's petition at this time.

By letter dated September 10, 2001, Sprint Communications Company, L.P. filed a letter in support of the request of WorldCom that the Board take no further action on this matter until six months following the latter of the Board's decisions on UNE rates, OSS testing or the Performance Assurance Plan.

By letter dated September 12, 2001, AT&T Communications of NJ, L.P. (AT&T) submitted a letter in lieu of a formal motion to establish procedures for the development of the Board's recommendation to the FCC in this matter, and also to express its support for the WorldCom submission dated September 7, 2001. AT&T agreed with WorldCom that the Board should allow a period of time for its anticipated pro-competition decisions to take root before initiating this proceeding. AT&T argued that, at a minimum, however, the pre-271 proceeding should be stayed until the pending UNE, OSS and performance remedies matters have been decided in order to afford interested parties the opportunity to probe the anticipated effects of those decisions on nature of the competition in the local market.

By letter dated September 21, 2001, Verizon responded to the correspondence of WorldCom dated September 7, 2001 and AT&T dated September 12, 2001. Referring to WorldCom and AT&T, Verizon asserted that the competitive local exchange carriers (CLECs) seek to inject unwarranted delay into this proceeding. Regarding commercial OSS testing, Verizon stated that it is already submitting monthly carrier-to-carrier performance reports.

By this Order, the Board responds to comments of the parties, and sets forth the procedures that the Board will follow as it reviews Verizon's compliance with Section 271. By this Order, the Board also invites interested parties to submit comments/position papers, according to the procedural schedule contained herein, in order to assist the Board in this effort.

### Section 271 of the Act

Pursuant to Section 271(d)(1) of the Act, a Bell Operating Company (BOC),<sup>2</sup> such as Verizon New Jersey Inc., may apply to the FCC for authorization to provide interLATA services<sup>3</sup> originating within its state region. A BOC meets the Act's requirements to provide in-region interLATA services if, within the state for which authorization is sought, such company provides access and interconnection to its network facilities pursuant to binding interconnection agreements, and such access and interconnection meets the requirements of the "competitive checklist" set forth Section 271(c)(2)(B). 47 U.S.C. § 271 (d)(3). Thus, pursuant to the Act, in order to qualify to provide in-region long distance services, a BOC must provide access and interconnection to other telecommunications carriers, which includes each of the following competitive checklist items:

- (1) interconnection in accordance with the requirements of Sections 251(c)(2)<sup>4</sup> and 252(d)(1);<sup>5</sup>
- (2) nondiscriminatory access to network elements in accordance with the requirements of Sections 251(c)(3)<sup>6</sup> and 251(d)(1);
- (3) nondiscriminatory access to the poles, ducts, conduits, and rights-of-way owned or controlled by the BOC at just and reasonable rates;
- (4) local loop transmission from the central office to the customer's premises, unbundled from local switching or other services;
- (5) local transport from the trunk side of a wireline local exchange carrier switch unbundled from switching or other services;
- (6) local switching unbundled from transport, local loop transmission, or other services;

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<sup>2</sup> The term "Bell Operating Company" is defined to include New Jersey Bell Telephone Company and its successor company, Verizon New Jersey Inc. See 47 U.S.C. §153(35).

<sup>3</sup> The term "interLATA service" is defined to mean telecommunications between a point located in a local access and transport area (LATA), and a point located outside such area. See 47 U.S.C. §153(42). "InterLATA service" is commonly known as long distance service.

<sup>4</sup> Section 251(c)(2) imposes on an incumbent local exchange carrier (ILEC), such as Verizon, the duty to provide, for the facilities and equipment of any requesting local exchange carrier (LEC), interconnection with the LEC's network for the transmission and routing of telephone exchange service and exchange access; at any technically feasible point within the ILEC's network; that is at least equal in quality to that provided by the ILEC to itself or to any party to which it provides interconnection; and, on rates, terms and conditions that are just, reasonable, and nondiscriminatory.

<sup>5</sup> Section 252(d)(1) requires that the just and reasonable rates for network elements and the interconnection of facilities and equipment, that are determined by a state public utility commission, must be nondiscriminatory and based on the cost of providing the interconnection or network element, and may include a reasonable profit.

<sup>6</sup> Section 251(c)(3) imposes on an ILEC the duty to provide to any requesting telecommunications carrier nondiscriminatory access to network elements on an unbundled basis at any technically feasible point on rates, terms, and conditions that are just, reasonable and nondiscriminatory.

- (7) nondiscriminatory access to:
  - (a) 911 and E911 services;
  - (b) directory assistance services to allow the other carrier's customers to obtain telephone numbers; and
  - (c) operator call completion services;
- (8) white pages directory listings for customers of the other carrier's telephone exchange service;
- (9) full compliance with telecommunications numbering administration guidelines, plans and rules;
- (10) nondiscriminatory access to databases and associated signaling necessary for call routing and completion;
- (11) full compliance with number portability regulations;
- (12) nondiscriminatory access to such services or information as are necessary to allow a requesting carrier to implement local dialing parity;
- (13) reciprocal compensation arrangements in accordance with the requirements of Section 252(d)(2);<sup>7</sup> and
- (14) telecommunications services available for resale in accordance with the requirements of Sections 251(c)(4)<sup>8</sup> and 252(d)(3).<sup>9</sup>

[47 U.S.C. §271(c)(2)(B)].

Section 271(d)(2) of the Act requires that the FCC, before making its decision on any BOC application to provide in-region interLATA services, consult with the United States Department of Justice and the relevant state public utility commission in order to verify the ILEC's compliance with the requirements of Section 271(c). In general, the requirements of Section 271(c) include compliance with the 14-point competitive checklist for access and interconnection on fair and nondiscriminatory terms.

### Discussion

As an initial matter, the Board agrees with Verizon that all prior dockets related to Section 271 reviews by the Board should be closed. Therefore, the Board HEREBY DIRECTS that Docket Nos. TO97030166 and TO96080597<sup>10</sup> be closed.

After careful review, the September 6, 2001 request from WorldCom for an extension of the OSS test is DENIED. The KPMG test has been concluded and interested parties will, through this Order, have an opportunity to review and comment on the scope and results of the test. In addition, parties have a further opportunity to submit verified comments/position papers on the validity of the Verizon filing. It is expected that the

<sup>7</sup> Section 252(d)(2) sets forth the standards by which a state public utility commission shall determine that reciprocal compensation charges are just and reasonable.

<sup>8</sup> Sections 251(c)(4) imposes on ILECs the duty to offer for resale at wholesale rates any telecommunication service that the carrier provides at retail to subscribers who are not telecommunications carriers, and the duty not to prohibit or impose unreasonable or discriminatory conditions on such resale.

<sup>9</sup> Sections 252(d)(3) requires a state public utility commission to determine wholesale rates on the basis of retail rates, excluding costs that will be avoided by the LEC in the resale of telecommunications services.

<sup>10</sup> BPU Docket No. TO96080597 relates to a petition by MCI Telecommunications Corporation seeking an investigation of issues arising under Section 271 of the Act.

specific issue of electronic billing, which is an option being made available at any CLEC's request, will be thoroughly discussed as part of that process. The Board notes that Verizon-Pennsylvania has modified its OSS systems in response to perceived concerns with this form of bill in Pennsylvania. During the course of the New Jersey KPMG OSS testing process, Verizon agreed to make the same modifications in New Jersey. The Board herein REQUIRES Verizon to make these changes in its New Jersey OSS. During the course of the review process now initiated, parties will have an opportunity to comment on whether Verizon's OSS, as modified to adopt the electronic billing changes made in Pennsylvania, complies with the requirements of Section 271 of the Act.

The Board has carefully considered the September 7, 2001 submission by WorldCom and the subsequent letters in support of WorldCom's motion recommending that the Board take no action on Verizon's current filing until six months after the Board's decisions on UNE rates, OSS testing or a Performance Assurance Plan. When Verizon makes its New Jersey 271 application with the FCC, the FCC will be required by Section 271(d)(3) to make its determination within 90 days thereof, and, the Board must be in a position to provide its consultation to the FCC. Therefore, the Board, by this Order, is establishing an expedited process and procedure to enable it to timely provide its consultative report to the FCC, after receiving input from all interested parties.

Before addressing the process and procedures to be implemented herein, the Board also notes that, in July 1998, the Board released the results of an investigation into the status of local competition. See Status of Local Telephone Competition: Report and Action Plan, In the Matter of the Investigation Regarding Local Exchange Competition for Telecommunications Services, Docket No. TX98010010 (July 1998) (hereinafter, Local Competition Report). As a result of this investigation, the Board found that: (1) inadequate OSS and (2) access to UNEs are the two major barriers to local land line residential market competition. See Local Competition Report at 17. In the Action Plan portion of the Local Competition Report, the Board directed that a Technical Solutions Facilitation Team (TSFT) meet with industry representatives and other interested parties to informally address, and hopefully resolve, OSS issues, including the scope and type of OSS testing. Id. at 104. Thereafter, the Board released an Order in which it determined that it has the authority under State law to order self-executing performance measurement remedies, and directed its Staff to propose appropriate performance remedies. See Order, In the Matter of the Investigation Regarding Local Exchange Competition for Telecommunications Services, et al, Docket Nos. TX95120631 et al (October 22, 1998). Following a lengthy series of TSFT meetings aimed at resolving performance standards and measures, on May 25, 2000, the Board adopted New Jersey Carrier-to-Carrier Guidelines, Performance Standards and Reports. See Order, In the Matter of the Investigation Regarding Local Exchange Competition for Telecommunications Services, Docket No. TX98010010 (July 13, 2000). Thereafter, the TSFT continued to meet in order to attempt to reach consensus on self-executing performance remedies for inadequate Verizon performance. The Board anticipates addressing appropriate remedies in the near future.

In order to determine the adequacy of Verizon's OSS, on May 12, 1999, the Board selected KPMG Consulting (KPMG) to conduct an independent third-party evaluation of Verizon's OSS. (KPMG Testing of Verizon-New Jersey's Operations Support Systems (OSS) Docket Nos. TX95120631, TO96070519, TO98010035, TO98060343). On September 5, 2001, KPMG filed the results of its OSS testing with the Board. See Draft Final Report, Version 1.1 (Draft OSS Report) of the Verizon OSS Evaluation Project for New Jersey. By this Order, the Board also establishes a schedule to conclude the review of the KPMG third party OSS assessment.

With regard to rates for unbundled network elements, on June 7, 2000, the Board initiated a proceeding on its own motion to review Verizon's unbundled network element rates as well as associated UNE issues previously decided by the Board in 1997. This review also incorporated for consideration any additional UNEs filed by Verizon since December 1997. United States District Court Judge Katharine Hayden rendered a decision on June 6, 2000, which affirmed in part, reversed in part, and remanded for further proceeding the Board's 1997 UNE Decision. The Board's pending UNE proceeding (Docket No. TO00060356) is addressing the issues raised in Judge Hayden's June 6, 2000 Decision.

The Board conducted comprehensive hearings on Verizon's unbundled network element rates, terms and conditions from November 28, 2000 to May 25, 2001. Briefs were filed on June 18, 2001 and reply briefs on July 13, 2001. The Board is currently reviewing the record, and anticipates addressing this matter at an upcoming Board meeting.

The Board now adopts a schedule that will allow interested parties the opportunity to seek information, and submit comments or written testimony, regarding Verizon's New Jersey Section 271 filing. The Board will also conduct hearings on the filing and on the comments of Verizon and interested parties. Finally, there will be an opportunity to summarize positions in briefs to the Board. Interested parties also will have an opportunity to participate in technical workshops regarding the Draft OSS Report, at which time KPMG staff will be available to clarify the contents of the Draft OSS Report, and receive suggestions for modifications to the Report of a technical nature. The comments, hearings and briefs, referred to above, will afford interested parties an opportunity to raise substantive issues regarding Verizon's OSS, the Draft OSS Report, and all other issues raised by Verizon's Section 271 filing.

As a whole, this process is intended to permit the Board to expeditiously receive relevant comments of a factual, legal and policy nature, and to timely file its consultative report with the FCC. The Board intends to ensure that this process is fair to all participants. Although this Order sets forth the process and procedure the Board intends to follow during the evaluation of Verizon's compliance with Section 271, this Order is merely a guide to the method by which the Board will gather the information necessary for its Section 271 consultative report to the FCC, and the Board will, where and when necessary, make adjustments to this procedure during the course of this matter. Although this Order contemplates the review will be completed within approximately 90 days, the Board reserves the right to extend this review beyond 90 days if circumstances warrant such an extension.

Although the Board must be in a position to timely provide its consultative report to the FCC, the Board notes that it reserves the right to suspend, revise or extend its Section 271 compliance review period, as appropriate. Verizon also will have several options at its disposal should a checklist compliance problem surface. For example, Verizon could: (1) continue with the process and risk an adverse recommendation from the Board; (2) request a suspension of the proceeding to allow time for corrective measures; (3) attempt to resolve the issue during the time period of this review process so as to prove compliance with a particular checklist item; or (4) withdraw its filing without prejudice.

#### Filings and Briefs in this Docket

The Board notes that Verizon has indicated that its September 5, 2001 filing contains information comparable to the data that will be provided to the FCC in its Section 271 application. The Board expects that Verizon's New Jersey filing, now in the Board's possession, contains comprehensive auditable information of sufficient detail to allow a meaningful evaluation of its compliance with the Section 271 requirements. The Board notes that Verizon's

filing is organized by checklist item, and contains verified declarations to support the data provided. It is similarly expected that commenting parties shall also file data that is auditable, in checklist item order, and supported by affidavits or verified statements. If, in the course of this review, Verizon produces additional information that significantly alters its September 5, 2001 filing, the Board may accept the information, but reserves the right to extend or restart the Section 271 review schedule adopted herein.

The Board REQUIRES that each brief or comment include a table of contents, and an appendix table of contents, if appropriate. If it has not already done so, Verizon shall also submit two (2) copies of its filing to the Board on CD-ROM electronic media. The Board DIRECTS Verizon to also post its New Jersey filing on its website. The comments of all parties shall be filed with the Board both electronically and by hard copy in the number of copies provided for in the Board's rules.

Copies of all filings, including responses to discovery requests, shall be sent to all parties on the service list created for this docket. This service list shall be posted on the Board's website and updated as necessary. Verizon shall, within five days of the date of this Order, serve notice of its New Jersey filing to: (1) all parties on the OSS and performance measures and remedies dockets; (2) all parties in the pending proceeding for review of Verizon's Plan for an Alternative Form of Regulation; (3) all CLECs with which it does business in the State, whether resellers or facilities-based carriers; (4) the clerk of each affected municipality; (5) the clerk to the board of chosen freeholders of each affected county; and (6) the chief executive officer of each affected county. Notice shall include notice of the hearing dates and locations, as set forth below.

Except for formal Board Orders, any document that Verizon or interested parties rely upon during the process shall be submitted in hard and electronic copy, if available, or shall be referenced to a website from which it can be downloaded. The Board shall take official notice of any Board proceeding it deems necessary to provide the basis for its consultative report to the FCC. Any non-New Jersey document relied upon, however, must be submitted in its entirety or be referenced by citation to a website from which the document can be downloaded. Citations to all authorities, legal or otherwise, shall be specific and complete.

#### Participation in the Docket

Any interested party wishing to participate in the Board's review of Verizon's Section 271 compliance filing, shall file a letter "Notice of Participation" with the Secretary of the Board, with a copy to all parties, setting forth with specificity their interest in this matter and the extent to which they would like to participate. Full parties may participate in discovery, any technical conferences, hearings and briefing. Participants wishing to limit their participation to receiving copies of all filings, attending public sessions, and/or filing comments with the Board should so indicate and will be designated "inactive participants." The Notice of Participation shall be captioned as such and reference Docket No. TO0109541. It should be brief and must include the names, telephone numbers and e-mail addresses for: (1) the company representative or individual who will be the contact person for official Board documents; (2) the contact person for discovery requests; and (3) any expert witnesses. Appropriate e-mail addresses are necessary to allow for the electronic exchange of information during the Board's Section 271 review process. The Board encourages interested parties to file Notices of Participation as soon as possible in order to receive copies of all filings. After October 9, 2001, the Board will not accept a Notice of Participation, absent a motion for leave to participate.

### Discovery Process

The Board contemplates a full exploration of the relevant issues through a cooperative exchange of information between Verizon and the participants. Burdensome, overly broad, non-relevant, or argumentative discovery shall not be permitted. Electronic discovery, as well as responses thereto, shall be permitted, as long as hard copies follow the electronic transmission. The Board encourages and expects parties to discuss discovery disagreements informally, and as soon as possible, in order to minimize delay. Objections to discovery or any other discovery disputes shall be immediately brought to Board Staff. After consideration and consultation with the Office of the Attorney General, Board Staff shall attempt to resolve the disputes with the parties. In the event the dispute cannot be resolved through this informal process, the Presiding Commissioner will issue a ruling, subject to subsequent consideration by the full Board. All responses to discovery requests are due, by hand delivery or electronically, no later than 5:00 p.m. on the date specified in the schedule contained herein. The Board directs Verizon to circulate to all active parties, who give notice of participation, a form of confidentiality agreement similar to the one used either in the Alternative Regulation Plan or UNE proceedings. An identical form of agreement shall be circulated to each party. Parties must sign and return a confidentiality agreement in order to receive copies of any confidential or proprietary data during discovery.

### Responses to Verizon's Section 271 Filing

As noted above, all participants may comment on Verizon's Section 271 filing and supporting documentation. Parties must organize comments by checklist items. Should a party choose not to comment on a checklist item, its comments should so state. Comments by participants that are not auditable, or not supported by affidavit or verified statement, shall be given commensurate weight by the Board. The Board does not anticipate that it will accept comments or briefs submitted after the scheduled date.

### Hearings

Acting President Connie O. Hughes is HEREBY DESIGNATED as the Presiding Commissioner for the hearings to be conducted in this matter. The hearings shall be held in the 8<sup>th</sup> Floor Hearing Room at the Board's Newark Office, 2 Gateway Center, Newark, New Jersey. Full parties may participate at the hearings by presenting expert witnesses and cross-examining other parties' expert witnesses. The Board does not anticipate oral argument at this time. The Board shall only consider non-resolved checklist items at the hearings. At the present time, the Board anticipates issuing a subsequent Order further detailing the organization of the hearings.

### Post-Hearing Briefs

As noted above, full parties may file post-hearing briefs. Tables of contents in checklist item order are required. Initial briefs shall be limited to 125 pages. Reply briefs shall be limited to 75 pages. Tables of contents and appendix materials shall not be counted in the page limitations. Argument appearing in appendix materials shall be counted against page limitations. Overlength briefs shall be returned and corrected within five (5) days of receipt. If an overlength brief is not timely corrected, it shall not be accepted.

Schedule for Discovery, Comments, Technical Conferences and Briefs

The Board HEREBY ADOPTS the following procedural schedule for the conduct of this matter. The Board DIRECTS Verizon and all interested parties to comply with this Order, including the procedural schedule set forth below. The Board reserves the right to suspend, revise or extend the schedule as necessary to achieve the intended purposes of this proceeding: full and fair participation by all parties, a thorough review of Verizon's compliance with the requirements of Section 271, and a simultaneous review of the KPMG Draft OSS Report.

	Sept. 5	KPMG Draft Final Report issued
Day 1	Sept. 5	Verizon NJ filed 271 state compliance filing with supporting data
Day 22	Sept. 26	Board Establishes Procedural Schedule
Day 29	Oct. 3	Deadline for discovery of Verizon, served electronically on all parties
Day 36	Oct. 10	Deadline for responses to discovery
Day 43	Oct. 17	CLECs and other interested parties file verified statements and/or affidavits
Day 50	Oct. 24	Deadline for discovery of other parties, served electronically on all parties
Day 57	Oct. 31	Deadline for responses to discovery
Day 58	Nov. 1	Parties File Stipulations
Day 59	Nov. 2	Final Verified Submissions
Day 64-66	Nov. 7-9	Hearings before the Board
Day 78	Nov. 21	Post Hearing Initial Briefs Due
Day 90	Dec. 3	Post Hearing Reply Briefs Due

KPMG Report Review

Sept 5	KPMG Draft Final Report issued
Oct 2-4	Technical Workshops
On or about Oct 9	KPMG Final Report issued

DATED: September 27, 2001

BOARD OF PUBLIC UTILITIES

BY:

(signed)  
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ACTING PRESIDENT

(signed)  
FREDERICK F. BUTLER  
COMMISSIONER

(signed)  
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COMMISSIONER

ATTEST:

(signed)  
FRANCES L. SMITH  
SECRETARY

IN THE MATTER OF THE CONSULTATIVE REPORT  
ON THE APPLICATION OF VERIZON NEW JERSEY INC.  
FOR FCC AUTHORIZATION TO PROVIDE IN-REGION,  
INTERLATA SERVICE IN NEW JERSEY

**Service List**

Docket No. TO01090541

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